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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9
10 NICOLE ZURSCHMIEDE,

11 Plaintiff,

12 vs.

13 THE LITTLE CHAPEL, LLC, a Domestic
Limited-Liability Company, d/b/a
14 CHAPEL OF THE FLOWERS, and DOE
Defendants I-X,

15 Defendants.

Case No.: 2:19-cv-00106-JCM-VCF

**STIPULATION AND ORDER TO EXTEND
TIME FOR DEFENDANT TO FILE A
RESPONSIVE PLEADING TO PLAINTIFF'S
COMPLAINT**

(Third Request)

16 Defendant The Chapel, LLC doing business as Chapel of The Flowers ("Defendant"),
17 (erroneously sued as "The Little Chapel, LLC), by and through its counsel, Jackson Lewis P.C.,
18 and Plaintiff Nicole Zurschmiede ("Plaintiff") by and through her counsel, HKM Employment
19 Attorneys LLP, hereby stipulate and agree to a third extension of the time for Defendant to file a
20 responsive pleading to Plaintiff's Complaint.

21 Plaintiff served her Complaint on May 10, 2019, and Defendant's response was due on
22 May 31, 2019. On May 30, 2019, pursuant to stipulation of the parties, the Court granted
23 Defendant a 30-day extension up to including June 30, 2019, to file its responsive pleading to
24 Plaintiff's Complaint. (ECF No. 10). On June 28, 2019, pursuant to stipulation of the parties, the
25 Court granted Defendant a second extension up to including July 22, 2019, to file its responsive
26 pleading to Plaintiff's Complaint, so the Parties could actively engage in settlement negotiations
27 following Defendant's investigation of the allegations in the Complaint. (ECF No. 12).

28 Due to the Fourth of July Holiday and intervening summer vacations of the Parties and

1 counsels, settlement discussions have taken longer than anticipated to conclude the process prior
2 to the current July 22, 2019 deadline for Defendant to respond to the Complaint. However, the
3 Parties remain actively engaged in settlement discussions and wish to avoid the potentially
4 unnecessary time and expense of Defendant's response to the Complaint, the Parties completion
5 of the FRCP 26(f) Conference, and the Parties exchanging initial disclosures. Accordingly, the
6 Parties have stipulated to a third extension of the deadline for Defendant to file a response to the
7 Complaint. The Parties have agreed to a three-week extension to allow the Parties enough time to
8 conclude their early settlement discussions.

9 Defendant shall, therefore, have a three-week extension up to and including Monday,
10 August 12, 2019, to file a responsive pleading to Plaintiff's Complaint.

11 This stipulation and order is sought in good faith and not for the purpose of delay. Two
12 prior requests for an extension of time have been made. The Parties recognize this is a third
13 request for extension, and likely the last extension the Court will grant on the deadline to respond
14 to the Complaint. The Parties are diligently engaged in settlement negotiations and endeavoring
15 to conclude this process prior to August 12, 2019; and, respectfully request the Court's approval
16 to permit the Parties to exhaust early settlement discussions before incurring further litigation
17 costs.

18 Dated this 19th day of July, 2019.

19 /s/ Deverie J. Christensen
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Nicole Zurschmiede

24 **IT IS SO ORDERED.**

25 Dated this 19th day of July, 2019.

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United States Magistrate Judge